

EXHIBIT 29

1 THE HONORABLE THOMAS S. ZILLY
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE WESTERN DISTRICT OF WASHINGTON

10 HUNTERS CAPITAL, LLC, et al.,

11 Plaintiffs,

12 v.

13 CITY OF SEATTLE,

14 Defendant.

Case No. 20-cv-00983

PLAINTIFFS' SUPPLEMENTAL RESPONSE
TO AMENDED INTERROGATORY NO. 3

15 Pursuant to the Federal Rules of Civil Procedure, Plaintiffs 12th & Pike Associates LLC,
16 Bergman's Lock And Key Services LLC, Hunters Capital LLC, Hunters Property Holdings, LLC,
17 Greenus Building, Inc., Madrona Real Estate Investors IV, LLC, Madrona Real Estate Investors VI,
18 LLC, Madrona Real Estate Services, LLC, Olive St Apartments LLC, Onyx Homeowners
19 Association, Matthew Ploszaj, Redside Partners, LLC, The Richmark Company d/b/a Richmark
20 Label, Shuffle LLC d/b/a Cure Cocktail, SRJ Enterprises d/b/a Car Tender, Sway And Cake LLC,
21 and Wade Biller ("Plaintiffs") hereby supplement their response to Defendant City of Seattle's
22 ("Defendant" or the "City") Interrogatory No. 3 as amended.

1 **INTERROGATORIES**

2 **INTERROGATORY NO. 3 (AMENDED):**

3 As to the matters described in your complaint, please identify each statute or ordinance that
4 the City failed to abide.

5 **SUPPLEMENTAL RESPONSE:**

6 Plaintiffs object that distinction between “failed to abide” and “was not enforced” as used in
7 amended Interrogatory No. 4 is vague and ambiguous. Plaintiffs also object that this interrogatory is
8 not clearly delineated in time or space. However, Plaintiffs have agreed to answer this question in
9 the interests of compromise to the best of their ability. Plaintiffs reserve the right to amend or
10 supplement this answer as appropriate.

11 Plaintiffs contend the City was affirmatively required to act, but failed to act as required
12 between at least June 8, 2020 and July 1, 2020, under at least the following statutes or ordinances:

13 Seattle Municipal Code (“SMC”) 10.02, Civil Emergencies

14 SMC 11.25, Parade Permits

15 SMC 15.04, Use and Occupation Permits

16 SMC 15.16, Cafes in the Public Space

17 SMC 15.17, Vending

18 SMC 15.40, Warning Lights and Barricades

19 SMC 15.44 Excavations and Fills

20 SMC 15.46, Debris in Public Places

21 SMC 15.52, Crowd Control Events

22 SMC 15.72, Sidewalk Maintenance

23 SMC 15.90, Enforcement

24 SMC 15.91, Citations

25 SMC 18.12, Parks Code

1 Fire Code, SMC 22.600.03202, including sections 105.6, 503.1, 503.4, and 104.11.

2 Seattle City Charter, Art. V, section 2.

3 DATED this 31st day of August, 2022.

4 **MORGAN, LEWIS & BOCKIUS LLP**

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